

EXHIBIT G

Mock, Matthew B.

From: Hanson, Andrew (ENRD) <Andrew.Hanson2@usdoj.gov>
Sent: Thursday, May 22, 2014 9:01 PM
To: More, Joshua
Cc: McLane, Bradford (ENRD); Dunn, Jason (ENRD); Beers, James (ENRD); Lofton, Jim (ENRD); Quinn, Elias (ENRD); Ziza, Iva (ENRD); Sterling, Carolyn (ENRD); Mock, Matthew B.; Williams, Jeannice D.; Scott, David C.
Subject: RE: Deposition Scheduling

Thanks. Taking Anderson off the list helps. The main issue is that we need to depose the Ameren witnesses who you say have information that you may rely on at trial to support your defenses. Apart from the two Rule 30(b)(6) notices we issued and the notice for Mr. Bosch, at this point we just need to get through your Rule 26(a) disclosures in order to wrap up our deposition discovery. So, if there are other witnesses you can remove, that would move the ball forward.

Tuesday afternoon should work for us. Let's try for 2 pm EST if that works for you and Jeannice.

-----Original Message-----

From: More, Joshua [mailto:jmore@schiffhardin.com]
Sent: Thursday, May 22, 2014 9:47 PM
To: Hanson, Andrew (ENRD)
Cc: McLane, Bradford (ENRD); Dunn, Jason (ENRD); Beers, James (ENRD); Lofton, Jim (ENRD); Quinn, Elias (ENRD); Ziza, Iva (ENRD); Sterling, Carolyn (ENRD); Mock, Matthew B.; Williams, Jeannice D.; Scott, David C.
Subject: Re: Deposition Scheduling

I first want to understand who you want. I am not surprised that we have different counts and thus want to bring clarity to the situation. To that end, we are no longer identifying Ken Anderson on our 26(a) disclosures.

Let's set a time on Tuesday to talk. Jeannice will join me as she will be handling the schedule going forward.

Josh More

Sent from my iPhone

> On May 22, 2014, at 7:15 PM, "Hanson, Andrew (ENRD)" <Andrew.Hanson2@usdoj.gov> wrote:

>

> Josh,

>

> We have a different count. In any event, are you planning to object to our deposition of the remaining Ameren witnesses on your Rule 26 disclosures? If so, please let us know as soon as possible.

> I'll be in touch shortly about proposed dates for your experts.

>

> Thanks,

> Andrew

>

> ----- Original Message -----

> From: More, Joshua [mailto:jmore@schiffhardin.com]

> Sent: Thursday, May 22, 2014 06:26 PM

> To: Hanson, Andrew (ENRD)

> Cc: McLane, Bradford (ENRD); Dunn, Jason (ENRD); Beers, James (ENRD);

> Lofton, Jim (ENRD); Quinn, Elias (ENRD); Ziza, Iva (ENRD); Sterling,
> Carolyn (ENRD); Mock, Matthew B. <MMock@schiffhardin.com>; Williams,
> Jeannice D. <jdwilliams@schiffhardin.com>; Scott, David C.
> <dscott@schiffhardin.com>; ENRD-Ameren Case Emails
> Subject: RE: Deposition Scheduling
>
> Andrew
>
> We are in the process of preparing objections to these notices and will be in a position to discuss dates after Memorial
Day. We should discuss the number of depositions that you have requested -- it is over 25.
>
> In addition, we should discuss scheduling the expert depositions, as their schedules are limited.
>
> Thanks
> Josh
>
>
> -----Original Message-----
> From: Hanson, Andrew (ENRD) [mailto:Andrew.Hanson2@usdoj.gov]
> Sent: Thursday, May 22, 2014 4:17 PM
> To: More, Joshua
> Cc: McLane, Bradford (ENRD); Dunn, Jason (ENRD); Beers, James (ENRD);
> Lofton, Jim (ENRD); Quinn, Elias (ENRD); Ziza, Iva (ENRD); Sterling,
> Carolyn (ENRD); Mock, Matthew B.; Williams, Jeannice D.; Scott, David
> C.; ENRD-Ameren Case Emails
> Subject: RE: Deposition Scheduling
>
> Josh - to follow up below, Brad will be in touch shortly with dates for several of the EPA witnesses you've requested.
Meanwhile, we also need to confirm dates for our two Rule 30(b)(6) depositions, currently noticed for June 5 and June
12. Given the limited time left in discovery we obviously need to get those set.
>
> Please also provide dates for Joe Sind, Chuck Naslund, and Ken Anderson the week of July 28 and the week of August
4.
>
> Thanks,
>
> Andrew
>
> Andrew C. Hanson
> Trial Attorney
> Environmental Enforcement Section
> Environment and Natural Resources Division U.S. Department of Justice P.O. Box 7611 Washington, D.C. 20044-7611
> Ph: (202) 514-9859
> Cell: (202) 305-5775
> Fax: (202) 616-6584
>
> All express mail deliveries should be sent to:
>
> Environmental Enforcement Section
> Environment and Natural Resources Division
> 601 D Street, N.W.
> Washington, D.C. 20004

>
>
> -----Original Message-----
> From: Hanson, Andrew (ENRD)
> Sent: Wednesday, May 21, 2014 5:11 PM
> To: More, Joshua
> Cc: McLane, Bradford (ENRD); Dunn, Jason (ENRD); Beers, James (ENRD); Lofton, Jim (ENRD); Quinn, Elias (ENRD); Ziza, Iva (ENRD); Sterling, Carolyn (ENRD); Mock, Matthew B.; Williams, Jeannice D.; Scott, David C.
> Subject: Re: Deposition Scheduling
>
> Sure. Just to recap, the following dates for Ameren witnesses are confirmed for June and July:
>
> June 12 - Bosch
> June 20 - Leingang
> July 18 - Meyer
> July 31 - Cardinale
>
> We're still waiting on Modeling Topic 6 and have been for some time now. Since we only have two fact depositions scheduled for June, please make the Modeling Topic 6 witness available in June.
>
> Thanks.
>
> Sent from my iPad
>
>> On May 21, 2014, at 4:07 PM, "More, Joshua" <jmore@schiffhardin.com> wrote:
>>
>> Thank you.
>>
>> -----Original Message-----
>> From: Hanson, Andrew (ENRD) [mailto:Andrew.Hanson2@usdoj.gov]
>> Sent: Wednesday, May 21, 2014 4:06 PM
>> To: More, Joshua
>> Cc: McLane, Bradford (ENRD); Dunn, Jason (ENRD); Beers, James (ENRD); Lofton, Jim (ENRD); Quinn, Elias (ENRD); Ziza, Iva (ENRD); Sterling, Carolyn (ENRD); Mock, Matthew B.; Williams, Jeannice D.; Scott, David C.
>> Subject: Re: Deposition Scheduling
>>
>> Josh - we've checked and can make those dates work. You can consider them confirmed.
>>
>> Sent from my iPad
>>
>>> On May 21, 2014, at 3:29 PM, "More, Joshua" <jmore@schiffhardin.com> wrote:
>>>
>>> Are you unavailable on July 18 and July 31 or would you just prefer different dates? Meyer and Cardinale are former employees who have commitments beyond our control. If you are available, we suggest you go forward with the depositions on those dates. These witnesses have been very difficult to schedule.
>>>
>>> Josh
>>>
>>> -----Original Message-----
>>> From: Hanson, Andrew (ENRD) [mailto:Andrew.Hanson2@usdoj.gov]
>>> Sent: Wednesday, May 21, 2014 1:54 PM
>>> To: More, Joshua

>>> Cc: McLane, Bradford (ENRD); Dunn, Jason (ENRD); Beers, James (ENRD); Lofton, Jim (ENRD); Quinn, Elias (ENRD); Ziza, Iva (ENRD); Sterling, Carolyn (ENRD); Mock, Matthew B.; Williams, Jeannice D.; Scott, David C.

>>> Subject: Re: Deposition Scheduling

>>>

>>> Josh - while we're checking schedules, we asked you for a range of dates for Meyer and Cardinale. Where are you with that? Also, we've been waiting months on Modeling Topic 6 so please provide us with dates as soon as possible. I'll let Brad get back to you on the dates for the EPA witnesses you're asking for. Finally, please provide a date for when you expect to supplement your interrogatories, specifically, Interrogatory No. 18. We've been waiting months for that, too.

>>>

>>> Thanks,

>>> Andrew

>>>

>>> Sent from my iPad

>>>

>>>> On May 21, 2014, at 1:36 PM, "More, Joshua" <jmore@schiffhardin.com> wrote:

>>>>

>>>> Thanks, Brad.

>>>>

>>>> I am checking our availability for Dave Campbell and John Knodel.

>>>>

>>>> We would like dates in July for Paul Arnold, Paul Wentworth, Greg Fried, and Eric Sturm. In particular, we would like to take Mr. Sturm on July 10.

>>>>

>>>> We would like to take Mr. Lloyd's deposition on August 5 or 6.

>>>>

>>>> In addition, we would like to take Mr. Worley's deposition in June, as opposed to July. This deposition was initially scheduled for April and postponed because Mr. Worley became sick. Thus, both parties are ready to proceed and we see no reason to postpone it any further.

>>>>

>>>> We are waiting for confirmation from you for Cardinale (July 31) and Meyer (July 18).

>>>>

>>>> We are working on identifying and preparing a witness on Modeling Topic 6 and hope to get you dates early next week.

>>>>

>>>> Josh

>>>>

>>>> Joshua R. More

>>>> Partner

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>>>> Chicago, IL 60606

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>>>> -----Original Message-----

>>>> From: McLane, Bradford (ENRD) [mailto:Bradford.McLane@usdoj.gov]

>>>> Sent: Wednesday, May 21, 2014 9:25 AM

>>>> To: More, Joshua; Mock, Matthew B.

>>>> Cc: Hanson, Andrew (ENRD); Dunn, Jason (ENRD); Beers, James (ENRD);
>>>> Lofton, Jim (ENRD); Quinn, Elias (ENRD); Ziza, Iva (ENRD);
>>>> Sterling, Carolyn (ENRD)
>>>> Subject: Deposition Scheduling
>>>>
>>>>
>>>> Josh,
>>>>
>>>> I am taking over the scheduling of the EPA witnesses depositions. Please direct further communications on this
topic to me.
>>>>
>>>> We can make Dave Campbell available in Philadelphia on June 19. Please let me know if that date works.
>>>>
>>>> Jon Knodel is available August 6, 13, or 20.
>>>>
>>>> I hope to be able to get you dates for Anna Wood tomorrow.
>>>>
>>>> Brad
>>>>
>>>> Sent from my iPad
>>>>
>>>> -----
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>>>> tax matters, it is not intended or written to be used, and cannot
>>>> be used by a taxpayer, for the purpose of avoiding penalties that
>>>> may be imposed on the taxpayer under law.
>>>> -----
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